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8 ATTORNEYS FOR DEFENDANTS

10 UNITED STATES DISTRICT COURT

11 DISTRICT OF NEVADA

12 * * *

13 ROBERT BEADLES, an individual,

14 Plaintiff,

15 vs.

Case No. 3:23-cv-00382-ART-CSD

16 JAMIE RODRIGUEZ, in her official
capacity as Registrar of Voters and in her
17 personal capacity; the WASHOE COUNTY
REGISTRAR OF VOTERS, a government /
18 agency; ERIC BROWN in his official
capacity as WASHOE COUNTY
19 MANAGER and in his personal capacity,
ALEXIS HILL in her official capacity as
20 CHAIRWOMAN OF WASHOE
COUNTY BOARD OF
21 COMMISSIONERS and in her personal
capacity; WASHOE COUNTY, Nevada, a
22 political subdivision of the State of Nevada,
and DOES I-X; and ROE
23 CORPORATIONS I-X.

**DEFENDANTS' STATEMENT
REGARDING REMOVAL**

24 Defendants.

25 Defendants Jamie Rodriguez, the Washoe County Registrar of Voters, Eric Brown,
26 Commissioner Alexis Hill, and Washoe County, by and through counsel, Deputy District

1 Attorney Lindsay Liddell, hereby jointly file this Statement Regarding Removal pursuant
2 to this Court's Minute Order, ECF No. 2. Defendants jointly state as follows:

- 3 1. Defendants Jamie Rodriguez, Washoe County Commissioner Alexis Hill,
4 Washoe County Manager Eric Brown, and Washoe County were each served
5 with a summons and copy of the Complaint on July 26, 2023. Exs. 1–4.
- 6 2. A Notice of Removal was filed on August 3, 2023, in the Second Judicial
7 District Court of the State of Nevada, in and for the County of Washoe, case
8 number CV23-01283. Ex. 5
- 9 3. A Petition for Removal was filed in this Court on August 3, 2023. (ECF No. 1).
- 10 4. Defendants Jamie Rodriguez, Washoe County Commissioner Alexis Hill, and
11 Washoe County Manager Eric Brown are not aware of any other defendants
12 who have been served with this action.

13 Dated this 9th day of August 2023.

14
15 CHRISTOPHER J. HICKS
16 District Attorney

17 By /s/ Lindsay L. Liddell
18 LINDSAY L. LIDDELL
19 Deputy District Attorney
20 One South Sierra Street
21 Reno, NV 89501
22 lliddell@da.washoecounty.gov
23 (775) 337-5700

24 ATTORNEY FOR DEFENDANTS
25
26

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of the Office of the District Attorney of Washoe County, over the age of 21 years and not a party to nor interested in the within action. I certify that on this date, I deposited for mailing in the U.S. Mails, with postage fully prepaid, a true and correct copy of the foregoing document in an envelope addressed to the following:

ROBERT BEADLES
10580 N. McCarran Blvd. #115, Apt. 386
Reno, NV 89503

Dated this 9th day August, 2023.

/s/ S. Haldeman
S. Haldeman

INDEX OF EXHIBITS

| | | |
|-----------|---|-----------|
| Exhibit 1 | Summons- Commissioner Alexis Hill | 2 pages |
| Exhibit 2 | Summons- Eric Brown | 2 pages |
| Exhibit 3 | Summons- Washoe County | 2 pages |
| Exhibit 4 | Summons- Jamie Rodriguez | 2 pages |
| Exhibit 5 | Notice of Removal | 130 pages |